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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,
Plaintiff,
v.
RONALD CRAIG ILG,
Defendant.

Case No. 2:21-cr-00049-WFN

**DECLARATION OF ANDREW M.
WAGLEY IN SUPPORT OF
DEFENDANT'S MOTION TO
EXCLUDE ALLEGED DARK
WEB MESSAGES AND WEBSITES**

I, Andrew M. Wagley, do hereby declare as follows:

1. I am over the age of eighteen and competent to testify regarding the matters stated herein.
2. I am one of the attorneys of record for the Defendant, Ronald C. Ilg (“Dr. Ilg”). I make this Declaration in Support of Defendant’s Motion to Exclude Alleged Dark Web Messages and Websites.

1 3. The accompanying Motion to Exclude Dark Web Messages and
2 Websites should be construed as a “dispositive motion” subject to
3 the 20-page limit of LCivR 7(f)(1), as incorporated into criminal
4 matters pursuant to LCivR 83. In this vein, the Motion seeks to
5 exclude and suppress from evidence the dark web messages,
6 transcript, and dark websites, which purport to be the crux of the
7 Government’s case against Dr. Ilg. As such, if this Motion were
8 granted, the disposition of multiple charges would likewise be
9 determined. *See* Fed. R. Crim. P. 59(b)(1) (defining “dispositive
10 matters” regarding magistrate referrals as “a defendant’s motion to
11 dismiss or quash an indictment or information, a motion to suppress
12 evidence, or any matter that may dispose of a charge or defense”).
13 Furthermore, this Motion seeks to exclude such evidence not only on
14 constitutional grounds (*i.e.*, the Confrontation Clause), but also
15 pursuant to multiple provisions of the Federal Rules of Evidence.
16 4. Attached hereto as **Exhibit A** is a true and correct copy of a
17 screenshot taken by me of a video provided by the Government in
18 discovery herein. This video is of the FBI’s alleged search of Dark
19 Website #1, entitled “Internet Killers.”

1 5. Attached hereto as **Exhibit B** is a true and correct copy of a
2 Screenshot taken by me of another video provided by the
3 Government in discovery herein. This video is of the FBI's alleged
4 search of Dark Website #2, entitled "Sinaloa Cartel Marketplace."
5
6 6. Attached hereto as **Exhibit C** is a true and correct copy of a
7 Screenshot taken by me of another video provided by the
8 Government in discovery. This video is of the FBI's alleged search
9 of Dark Website #3, entitled "Dark Bitcoin Escrow (DBE)."
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11 7. Attached hereto as **Exhibit D** is a true and correct copy of a Serial 22
12 Report propounded by the Government during discovery herein.

13
14 I hereby declare the foregoing is true and correct under penalty of perjury
15
16 of the laws of the State of Washington and the United States.
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19 EXECUTED this 1st day of July, 2022 in Spokane, Washington.
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24 By: /s/ Andrew M. Wagley
25 Andrew M. Wagley
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CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all attorneys of record in this matter.

EXECUTED in Spokane, Washington this 1st day of July, 2022.

By: /s/ Jodi Dineen
Jodi Dineen, Paralegal